

**BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of Petition to Revoke Probation
Against:

**SUSAN ANN COBURN,
a.k.a. SUE ANN COBURN,
a.k.a. SUE COBURN SOTO**
3076 Baronscourt Way
San Jose, CA 95132

Registered Nurse License No. 431649
Nurse Practitioner Certificate No. 8774

Respondent.

Case No. 2003-191

OAH No. N2007030047

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing as its Decision in this matter.

This Decision shall become effective on OCTOBER 17, 2007.

It is so ORDERED OCTOBER 17, 2007.



FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 REBECCA HEINSTEIN, State Bar No. 173202
Deputy Attorney General
4 California Department of Justice
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5604
6 Facsimile: (415) 703-5480

7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Petition to Revoke Probation
13 Against:

14 **SUSAN ANN COBURN,**
a.k.a. SUE ANN COBURN,
a.k.a. SUE COBURN SOTO
3076 Baronscourt Way
San Jose, CA 95132

15 Registered Nurse License No. 431649
16 Nurse Practitioner Certificate No. 8774

17 Respondent.

Case No. 2003-191

OAH No. N2007030047

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
20 proceeding that the following matters are true:

21 **PARTIES**

22 1. Ruth Ann Terry, M.P.H, R.N (Complainant) is the Executive Officer of
23 the Board of Registered Nursing. She brought this action solely in her official capacity and is
24 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
25 by Rebecca Heinstein, Deputy Attorney General.

26 2. Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a. Sue Coburn Soto
27 (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to
28 be represented by counsel.

3. On or about August 31, 1988, the Board of Registered Nursing issued Registered Nurse License No. 431649 to Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a. Sue Coburn Soto (Respondent). The License was in full force and effect at all times relevant to the charges brought in Petition to Revoke Probation No. 2003-191 and will expire on September 30, 2008, unless renewed.

4. On or about October 18, 1996, the Board of Registered Nursing issued Nurse Practitioner Certificate No. 8774 to Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a. Sue Coburn Soto (Respondent). The Certificate was in full force and effect at all times relevant to the charges brought in Petition to Revoke Probation No. 2003-191 and will expire on September 30, 2008, unless renewed.

JURISDICTION

5. Petition to Revoke Probation No. 2003-191 was filed before the Board of Registered Nursing, Department of Consumer Affairs (Board), and is currently pending against Respondent. The Petition to Revoke Probation and all other statutorily required documents were properly served on Respondent on January 24, 2007. Respondent timely filed her Notice of Defense contesting the Petition to Revoke Probation. A copy of Petition to Revoke Probation No. 2003-191 is attached as Exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, and understands the charges and allegations in Petition to Revoke Probation No. 2003-191. Respondent also has carefully read, and fully understands the effects of this Stipulated Surrender of License and Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Petition to Revoke Probation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

9. Respondent admits the truth of each and every charge and allegation in Petition to Revoke Probation No. 2003-191, agrees that cause exists for discipline and hereby surrenders her Registered Nurse License No. 431649 for the Board's formal acceptance.

10. Respondent admits the truth of each and every charge and allegation in Petition to Revoke Probation No. 2003-191, agrees that cause exists for discipline and hereby surrenders her Nurse Practitioner Certificate No. 8774 for the Board's formal acceptance.

11. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Registered Nurse License without further process.

12. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Nurse Practitioner Certificate without further process.

RESERVATION

13. The admissions made by Respondent herein are only for the purposes of this proceeding, or any other proceedings in which the Board or other professional licensing agency is involved, and shall not be admissible in any other criminal or civil proceeding.

OTHER MATTERS

14. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

15. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

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/ / /

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 431649 and Nurse Practitioner Certificate No. 8774 issued to Respondent Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a. Sue Coburn Soto are surrendered and accepted by the Board of Registered Nursing.

16. The surrender of Respondent's Registered Nurse License and Nurse Practitioner Certificate and the acceptance of the surrendered licenses by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

17. Respondent shall lose all rights and privileges as a Registered Nurse and Nurse Practitioner in California as of the effective date of the Board's Decision and Order.

18. Respondent shall cause to be delivered to the Board both her pocket licenses and wall certificates on or before the effective date of the Decision and Order.

19. Respondent fully understands and agrees that if she ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Petition to Revoke Probation No. 2003-191 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

20. Should Respondent ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Petition to Revoke Probation No. 2003-191 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

21. Respondent shall not apply for licensure or petition for reinstatement for two (2) years from the effective date of the Board's Decision and Order.

/ / /

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License and Nurse Practitioner Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 8.7.07

Sue Ann Coburn
SUSAN ANN COBURN,
a.k.a. SUE ANN COBURN,
a.k.a. SUE COBURN SOTO
Respondent

AKA Sue Coburn Soto
AKA Susan Ann Coburn

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing.

DATED: 8/14/07

EDMUND G. BROWN JR., Attorney General
of the State of California

FRANK H. PACOE
Supervising Deputy Attorney General

Rebecca Heinstein
REBECCA HEINSTEIN
Deputy Attorney General

Attorneys for Complainant

Exhibit A

Petition to Revoke Probation No. 2003-191

1 BILL LOCKYER, Attorney General
of the State of California
2 FRANK PACOE
Supervising Deputy Attorney General
3 REBECCA M. HEINSTEIN, State Bar No. 173202
Deputy Attorney General
4 California Department of Justice
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5604
6 Facsimile: (415) 703-5480
7 Attorneys for Complainant

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Petition to Revoke Probation
Against:

Case No. 2003-191

12 **SUSAN ANN COBURN,**
13 **a.k.a. SUE ANN COBURN,**
14 **a.k.a. SUE COBURN SOTO**
3076 Baronscourt Way
San Jose, CA 95132

**PETITION TO REVOKE
PROBATION**

15 Registered Nurse License No. 431649
16 Nurse Practitioner Certificate No. 8774

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Petition to
21 Revoke Probation solely in her official capacity as the Executive Officer of the Board of
22 Registered Nursing, Department of Consumer Affairs.

23 2. On or about August 31, 1988, the Board of Registered Nursing issued
24 Registered Nurse License Number 431649 to Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a.
25 Sue Coburn Soto (Respondent). The license was in full force and effect at all times relevant to
26 the charges brought herein and will expire on September 30, 2008, unless renewed.
27

28 / / /

1 3. On or about October 18, 1996, the Board of Registered Nursing issued
2 Nurse Practitioner Certificate No. 8774 to Susan Ann Coburn, a.k.a. Sue Ann Coburn, a.k.a. Sue
3 Coburn Soto (Respondent). The certificate was in full force and effect at all times relevant to the
4 charges brought herein and will expire on September 30, 2008, unless renewed.

5 4. In a disciplinary action entitled "In the Matter of the Accusation Against
6 Susan Ann Coburn, a.k.a. Sue Ann Coburn" Case No. 2003-191, the Board of Registered
7 Nursing issued a decision, effective January 23, 2004, in which Respondent's Registered Nurse
8 License was revoked. However, the revocation was stayed and Respondent was placed on
9 probation for a period of three (3) years, with certain terms and conditions. A copy of the
10 decision is attached as Exhibit A and is incorporated by reference.

11 **FIRST CAUSE TO REVOKE PROBATION**

12 **(Failure to Submit Written Reports)**

13 5. At all times after the effective date of Respondent's probation, Condition
14 #5 stated:

15 **Submit Written Reports.** Respondent, during the period of probation,
16 shall submit or cause to be submitted such written reports/declarations
17 and verification of actions under penalty of perjury, as required by the
18 Board. These reports/declarations shall contain statements relative to
Respondent's compliance with all the conditions of the Board's
Probation Program. Respondent shall immediately execute all release
of information forms as may be required by the Board or its representatives.

19 Respondent shall provide a copy of this Decision to the nursing regulatory
20 agency in every state and territory in which she has a registered nurse license.

21 6. Respondent's probation is subject to revocation because she failed to
22 comply with Condition #5, referenced above. Respondent failed to submit or cause to be
23 submitted evidence of having completed the required therapy or counseling program.

24 7. Respondent also failed to submit or cause to be submitted a letter from her
25 prescribing physician regarding her use of Hydrocodone (Vicodin), including the dosage, the date
26 (s) the medication was prescribed, Respondent's prognosis, the date the medication would no
27 longer be required, and the effect on her recovery plan, if appropriate.

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1 **SECOND CAUSE TO REVOKE PROBATION**

2 **(Failure to Abstain from Use of Psychotropic (Mood-Altering) Drugs)**

3 8. At all times after the effective date of Respondent's probation, Condition

4 #16 stated:

5 **Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent
6 shall completely abstain from the possession, injection or consumption
7 by any route of all psychotropic (mood altering) drugs, including alcohol,
8 except when the same are ordered by a health care professional legally
9 authorized to do so and are part of documented medical treatment.
10 Respondent shall have sent to the Board, in writing and within fourteen (14)
11 days, by the prescribing health professional, a report identifying the
12 medication, dosage, the date the medication was prescribed, the
13 Respondent's prognosis, the date the medication will no longer be
14 required, and the effect on the recovery plan, if appropriate.

15 Respondent shall identify for the Board a single physician, nurse practitioner
16 or physician assistant who shall be aware of Respondent's history of substance
17 abuse and will coordinate and monitor any prescriptions for Respondent for
18 dangerous drugs, controlled substances or mood-altering drugs. The coordinating
19 physician, nurse practitioner, or physician assistant shall report to the Board on a
20 quarterly basis Respondent's compliance with this condition. If any substances
21 considered addictive have been prescribed, the report shall identify a program for
22 the time limited use of any such substances.

23 The Board may require the single coordinating physician, nurse practitioner, or
24 physician assistant to be a specialist in addictive medicine, or to consult with a
25 specialist in addictive medicine.

26 9. Respondent's probation is subject to revocation because she failed to
27 comply with Condition #16, referenced above. On or about February 21, 2006, June 1, 2006,
28 June 19, 2006, August 7, 2006, and September 6, 2006, Respondent failed to abstain from mood-
29 altering substances by testing positive for Hydrocodone (Vicodin), without providing the
30 required detailed letter from the prescribing physician, as set forth in paragraph 7, above.

31 10. On or about May 10, 2005, April 19, 2006, and October 18, 2006,
32 Respondent's biological fluid test was "diluted." On or about July 29, 2004 and December 28,
33 2004, Respondent's biological fluid test was "out of range."

34 **THIRD CAUSE TO REVOKE PROBATION**

35 **(Failure to Submit to Tests and Samples)**

36 11. At all times after the effective date of Respondent's probation, Condition

37 #17 stated:

1 **Submit to Tests and Samples.** Respondent, at her expense, shall participate in a
2 random, biological fluid testing or drug screening program which the Board
3 approves. The length of time and frequency will be subject to approval by the
4 Board. Respondent is responsible for keeping the Board informed of
5 Respondent's current telephone number at all times. Respondent shall also ensure
6 that reports are submitted directly by the testing agency to the Board, as directed.
7 Any confirmed positive finding shall be reported immediately to the Board by the
8 program and Respondent shall be considered in violation of probation.

9 In addition, Respondent, at any time during the period of probation, shall fully
10 cooperate with the Board or any of its representatives, and shall, when requested,
11 submit to such tests and samples as the Board or its representatives may require
12 for the detection of alcohol, narcotics, hypnotics, dangerous drugs, or other
13 controlled substances.

14 If Respondent has a positive drug screen for any substances not legally authorized
15 and not reported to the coordinating physician, nurse practitioner, or physician
16 assistant, and the Board files a petition to revoke probation or an accusation, the
17 Board may suspend Respondent from practice pending the final decision on the
18 petition to revoke probation or the accusation. This period of suspension will not
19 apply to the reduction of this probationary time period.

20 If Respondent fails to participate in random, biological fluid testing or drug
21 screening program within the specified time frame, Respondent shall immediately
22 cease practice and shall not resume practice until notified by the Board. After
23 taking into account documented evidence of mitigation, if the Board files a
24 petition to revoke probation or an accusation, the Board may suspend Respondent
25 from practice pending the final decision on the petition to revoke probation or the
26 accusation. This period of suspension will not apply to the reduction of this
27 probationary time period.

28 12. Respondent's probation is subject to revocation because she failed to
comply with Condition #17, referenced above. Respondent failed to comply with the drug
screening program in that on or about June 23, 2005 and July 5, 2005, Respondent failed to
undergo biological fluid testing because she failed to keep her account current with First Lab.

 13. On or about December 21, 2005, Respondent failed to set up a time to be
tested with First Lab. On or about June 28, 2006, Respondent appeared for testing, but was nine
(9) days late.

FOURTH CAUSE FOR DISCIPLINE

(Failure to Fully Comply With Probation Program)

 14. At all times after the effective date of Respondent's probation, Condition
#2 stated:

Comply with Probation Program. Respondent shall fully comply with the
terms and conditions of the Probation Program established by the Board and

1 cooperate with representatives of the Board in its monitoring and investigation of
2 Respondent's compliance with the Probation Program. Respondent shall inform
3 the Board in writing within no more than 15 days of any address change and shall
4 at all times maintain an active, current license status with the Board, including
5 during any period of suspension.

6 15. Respondent's probation is subject to revocation because she failed to
7 comply with Condition #2, referenced above. Respondent failed to comply with the conditions
8 of her probation by failing to comply with Conditions #5, #16, and #17, as set forth above.


9 **PRAYER**

10 **WHEREFORE**, Complainant prays that a hearing be held on the matters herein
11 alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

12 1. Revoking the probation granted by the Board of Registered Nursing in
13 Case No. 2003-191 and imposing the disciplinary order that was stayed, thereby revoking
14 Registered Nurse License Number 431649, issued to Susan Ann Coburn, a.k.a. Sue Ann Coburn,
15 a.k.a. Sue Coburn Soto;

16 2. Taking such other and further action as deemed necessary and proper.

17 DATED: 1/17/07

18 
19 RUTH ANN TERRY, M.P.H., R.N.
20 Executive Officer
21 Board of Registered Nursing
22 Department of Consumer Affairs
23 State of California

24 Complainant
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Exhibit A
Decision and Order, Effective January 23, 2004
Board of Registered Nursing Case No. 2003-191

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

SUSAN ANN COBURN, AKA SUE ANN
COBURN
Post Office Box 360160
Milpitas, CA 95036

Registered Nurse License No. 431649

Respondent.

Case No. 2003-191

OAH No.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by
the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 23, 2004.

It is so ORDERED December 23, 2003.

Sandra R. Erickson

FOR THE BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS

BILL LOCKYER, Attorney General
of the State of California
MARETTA D. WARD, State Bar No. 176470
Deputy Attorney General
California Department of Justice
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-1384
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ORIGINAL

Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2003-191

SUSAN ANN COBURN, AKA SUE ANN
COBURN

OAH No.

Post Office Box 360160
Milpitas, CA 95036

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

Registered Nurse License No. 431649

Respondent.

In the interest of a prompt and speedy settlement of this matter, consistent with the public interest and the responsibility of the Board of Registered Nursing of the Department of Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order which will be submitted to the Board for approval and adoption as the final disposition of the Accusation

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. (Complainant) is the Executive Officer of the Board of Registered Nursing. She brought this action solely in her official capacity and is represented in this matter by Bill Lockyer, Attorney General of the State of California, by Marett D. Ward, Deputy Attorney General.

2. Respondent SUSAN ANN COBURN, aka SUE ANN COBURN (Respondent) is represented in this proceeding by attorney James E. Leininger, Esquire, whose

1 address is 181 Devine Street, San Jose, CA 95110.

2 3. On or about August 31, 1988, the Board of Registered Nursing issued
3 Registered Nurse License No. 431649 to SUSAN ANN COBURN, aka SUE ANN COBURN
4 (Respondent). The License was in full force and effect at all times relevant to the charges
5 brought in Accusation No. 2003-191 and will expire on September 30, 2004, unless renewed.

6 **JURISDICTION**

7 4. Accusation No. 2003-191 was filed before the Board of Registered
8 Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent.
9 The Accusation and all other statutorily required documents were properly served on Respondent
10 on March 14, 2003. Respondent timely filed her Notice of Defense contesting the Accusation.
11 A copy of Accusation No. 2003-191 is attached as Exhibit A and incorporated herein by
12 reference.

13 **ADVISEMENT AND WAIVERS**

14 5. Respondent has carefully read, fully discussed with counsel, and
15 understands the charges and allegations in Accusation No. 2003-191. Respondent has also
16 carefully read, fully discussed with counsel, and understands the effects of this Stipulated
17 Settlement and Disciplinary Order.

18 6. Respondent is fully aware of her legal rights in this matter, including the
19 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
20 counsel at her own expense; the right to confront and cross-examine the witnesses against her;
21 the right to present evidence and to testify on her own behalf; the right to the issuance of
22 subpoenas to compel the attendance of witnesses and the production of documents; the right to
23 reconsideration and court review of an adverse decision; and all other rights accorded by the
24 California Administrative Procedure Act and other applicable laws.

25 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
26 each and every right set forth above.

27 **CULPABILITY**

28 8. Respondent admits the truth of each and every charge and allegation in

1 Accusation No. 2003-191.

2 9. Respondent agrees that her Registered Nurse License is subject to
3 discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the
4 Disciplinary Order below.

5 **CONTINGENCY**

6 10. This stipulation shall be subject to approval by the Board of Registered
7 Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the
8 Board of Registered Nursing may communicate directly with the Board regarding this stipulation
9 and settlement, without notice to or participation by Respondent or her counsel. By signing the
10 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
11 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
12 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
13 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
14 action between the parties, and the Board shall not be disqualified from further action by having
15 considered this matter.

16 11. The parties understand and agree that facsimile copies of this Stipulated
17 Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same
18 force and effect as the originals.

19 12. In consideration of the foregoing admissions and stipulations, the parties
20 agree that the Board may, without further notice or formal proceeding, issue and enter the
21 following Disciplinary Order:

22 **DISCIPLINARY ORDER**

23 **IT IS HEREBY ORDERED** that Registered Nurse License No. 431649 issued
24 to Respondent SUSAN ANN COBURN, aka SUE ANN COBURN is revoked. However, the
25 revocation is stayed and Respondent is placed on probation for three (3) years on the following
26 terms and conditions.

27 **Severability Clause.** Each condition of probation contained herein is a separate
28 and distinct condition. If any condition of this Order, or any application thereof, is declared

1 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
2 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
3 and enforceable to the fullest extent permitted by law.

4 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.
5 A full and detailed account of any and all violations of law shall be reported by Respondent to
6 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
7 compliance with this condition, Respondent shall submit completed fingerprint forms and
8 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
9 as part of the licensure application process.

10 **Criminal Court Orders:** If Respondent is under criminal court orders, including
11 probation or parole, and the order is violated, this shall be deemed a violation of these probation
12 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

13 2. **Comply with the Board's Probation Program.** Respondent shall fully
14 comply with the conditions of the Probation Program established by the Board and cooperate
15 with representatives of the Board in its monitoring and investigation of the Respondent's
16 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
17 within no more than 15 days of any address change and shall at all times maintain an active,
18 current license status with the Board, including during any period of suspension.

19 Upon successful completion of probation, Respondent's license shall be fully
20 restored.

21 3. **Report in Person.** Respondent, during the period of probation, shall
22 appear in person at interviews/meetings as directed by the Board or its designated
23 representatives.

24 4. **Residency, Practice, or Licensure Outside of State.** Periods of
25 residency or practice as a registered nurse outside of California shall not apply toward a reduction
26 of this probation time period. Respondent's probation is tolled, if and when she resides outside
27 of California. Respondent must provide written notice to the Board within 15 days of any change
28 of residency or practice outside the state, and within 30 days prior to re-establishing residency or

1 returning to practice in this state.

2 Respondent shall provide a list of all states and territories where she has ever been
3 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
4 provide information regarding the status of each license and any changes in such license status
5 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
6 new nursing license during the term of probation.

7 5. **Submit Written Reports.** Respondent, during the period of probation,
8 shall submit or cause to be submitted such written reports/declarations and verification of actions
9 under penalty of perjury, as required by the Board. These reports/declarations shall contain
10 statements relative to Respondent's compliance with all the conditions of the Board's Probation
11 Program. Respondent shall immediately execute all release of information forms as may be
12 required by the Board or its representatives.

13 Respondent shall provide a copy of this Decision to the nursing regulatory agency
14 in every state and territory in which she has a registered nurse license.

15 6. **Function as a Registered Nurse.** Respondent, during the period of
16 probation, shall engage in the practice of registered nursing in California for a minimum of 24
17 hours per week for 6 consecutive months or as determined by the Board.

18 For purposes of compliance with the section, "engage in the practice of registered
19 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
20 work in any non-direct patient care position that requires licensure as a registered nurse.

21 The Board may require that advanced practice nurses engage in advanced practice
22 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the
23 Board.

24 If Respondent has not complied with this condition during the probationary term,
25 and Respondent has presented sufficient documentation of her good faith efforts to comply with
26 this condition, and if no other conditions have been violated, the Board, in its discretion, may
27 grant an extension of Respondent's probation period up to one year without further hearing in
28 order to comply with this condition. During the one year extension, all original conditions of

1 probation shall apply.

2 7. **Employment Approval and Reporting Requirements.** Respondent
3 shall obtain prior approval from the Board before commencing or continuing any employment,
4 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
5 performance evaluations and other employment related reports as a registered nurse upon request
6 of the Board.

7 Respondent shall provide a copy of this Decision to her employer and immediate
8 supervisors prior to commencement of any nursing or other health care related employment.

9 In addition to the above, Respondent shall notify the Board in writing within
10 seventy-two (72) hours after she obtains any nursing or other health care related employment.
11 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
12 terminated or separated, regardless of cause, from any nursing, or other health care related
13 employment with a full explanation of the circumstances surrounding the termination or
14 separation.

15 8. **Supervision.** Respondent shall obtain prior approval from the Board
16 regarding Respondent's level of supervision and/or collaboration before commencing or
17 continuing any employment as a registered nurse, or education and training that includes patient
18 care.

19 Respondent shall practice only under the direct supervision of a registered nurse
20 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
21 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
22 are approved.

23 Respondent's level of supervision and/or collaboration may include, but is not
24 limited to the following:

25 (a) Maximum - The individual providing supervision and/or collaboration is
26 present in the patient care area or in any other work setting at all times.

27 (b) Moderate - The individual providing supervision and/or collaboration is in
28 the patient care unit or in any other work setting at least half the hours Respondent works.

1 (c) Minimum - The individual providing supervision and/or collaboration has
2 person-to-person communication with Respondent at least twice during each shift worked.

3 (d) Home Health Care - If Respondent is approved to work in the home health
4 care setting, the individual providing supervision and/or collaboration shall have person-to-
5 person communication with Respondent as required by the Board each work day. Respondent
6 shall maintain telephone or other telecommunication contact with the individual providing
7 supervision and/or collaboration as required by the Board during each work day. The individual
8 providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-
9 site visits to patients' homes visited by Respondent with or without Respondent present.

10 9. **Employment Limitations.** Respondent shall not work for a nurse's
11 registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a
12 traveling nurse, or for an in-house nursing pool.

13 Respondent shall not work for a licensed home health agency as a visiting nurse
14 unless the registered nursing supervision and other protections for home visits have been
15 approved by the Board. Respondent shall not work in any other registered nursing occupation
16 where home visits are required.

17 Respondent shall not work in any health care setting as a supervisor of registered
18 nurses. The Board may additionally restrict Respondent from supervising licensed vocational
19 nurses and/or unlicensed assistive personnel on a case-by-case basis.

20 Respondent shall not work as a faculty member in an approved school of nursing
21 or as an instructor in a Board approved continuing education program.

22 Respondent shall work only on a regularly assigned, identified and predetermined
23 worksite(s) and shall not work in a float capacity.

24 If Respondent is working or intends to work in excess of 40 hours per week, the
25 Board may request documentation to determine whether there should be restrictions on the hours
26 of work.

27 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall
28 enroll and successfully complete a course(s) relevant to the practice of registered nursing no later

1 than six months prior to the end of her probationary term.

2 Respondent shall obtain prior approval from the Board before enrolling in the
3 course(s). Respondent shall submit to the Board the original transcripts or certificates of
4 completion for the above required course(s). The Board shall return the original documents to
5 Respondent after photocopying them for its records.

6 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with
7 its investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
8 amount of \$3,286.00 respondent shall be permitted to pay these costs in a payment plan approved
9 by the Board, with payments to be completed no later than three months prior to the end of the
10 probation term.

11 If Respondent has not complied with this condition during the probationary term,
12 and Respondent has presented sufficient documentation of her good faith efforts to comply with
13 this condition, and if no other conditions have been violated, the Board, in its discretion, may
14 grant an extension of Respondent's probation period up to one year without further hearing in
15 order to comply with this condition. During the one year extension, all original conditions of
16 probation will apply.

17 12. **Violation of Probation.** If Respondent violates the conditions of her
18 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
19 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's
20 license.

21 If during the period of probation, an accusation or petition to revoke probation has
22 been filed against Respondent's license or the Attorney General's Office has been requested to
23 prepare an accusation or petition to revoke probation against Respondent's license, the
24 probationary period shall automatically be extended and shall not expire until the accusation or
25 petition has been acted upon by the Board.

26 13. **License Surrender.** During Respondent's term of probation, if she ceases
27 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
28 probation, Respondent may surrender her license to the Board. The Board reserves the right to

1 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
2 take any other action deemed appropriate and reasonable under the circumstances, without
3 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
4 will no longer be subject to the conditions of probation.

5 Surrender of Respondent's license shall be considered a disciplinary action and
6 shall become a part of Respondent's license history with the Board. A registered nurse whose
7 license has been surrendered may petition the Board for reinstatement no sooner than the
8 following minimum periods from the effective date of the disciplinary decision:

9 (1) Two years for reinstatement of a license that was surrendered for any
10 reason other than a mental or physical illness; or

11 (2) One year for a license surrendered for a mental or physical illness.

12 14. **Physical Examination.** Within 45 days of the effective date of this
13 Decision, Respondent, at her expense, shall have a licensed physician, nurse practitioner, or
14 physician assistant, who is approved by the Board before the assessment is performed, submit an
15 assessment of the Respondent's physical condition and capability to perform the duties of a
16 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If
17 medically determined, a recommended treatment program will be instituted and followed by the
18 Respondent with the physician, nurse practitioner, or physician assistant providing written
19 reports to the Board on forms provided by the Board.

20 If Respondent is determined to be unable to practice safely as a registered nurse,
21 the licensed physician, nurse practitioner, or physician assistant making this determination shall
22 immediately notify the Board and Respondent by telephone, and the Board shall request that the
23 Attorney General's office prepare an accusation or petition to revoke probation. Respondent
24 shall immediately cease practice and shall not resume practice until notified by the Board.
25 During this period of suspension, Respondent shall not engage in any practice for which a license
26 issued by the Board is required until the Board has notified Respondent that a medical
27 determination permits Respondent to resume practice. This period of suspension will not apply
28 to the reduction of this probationary time period.

1 If Respondent fails to have the above assessment submitted to the Board within
2 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
3 practice until notified by the Board. This period of suspension will not apply to the reduction of
4 this probationary time period. The Board may waive or postpone this suspension only if
5 significant, documented evidence of mitigation is provided. Such evidence must establish good
6 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
7 provided. Only one such waiver or extension may be permitted.

8 **15. Participate in Treatment/Rehabilitation Program for Chemical**
9 **Dependence.** Respondent, at her expense, shall successfully complete during the probationary
10 period or shall have successfully completed prior to commencement of probation a Board-
11 approved treatment/rehabilitation program of at least six months duration. As required, reports
12 shall be submitted by the program on forms provided by the Board. If Respondent has not
13 completed a Board-approved treatment/rehabilitation program prior to commencement of
14 probation, Respondent, within 45 days from the effective date of the decision, shall be enrolled in
15 a program. If a program is not successfully completed within the first nine months of probation,
16 the Board shall consider Respondent in violation of probation.

17 Based on Board recommendation, each week Respondent shall be required to
18 attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics
19 Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and directed
20 by the Board. If a nurse support group is not available, an additional 12-step meeting or
21 equivalent shall be added. Respondent shall submit dated and signed documentation confirming
22 such attendance to the Board during the entire period of probation. Respondent shall continue
23 with the recovery plan recommended by the treatment/rehabilitation program or a licensed
24 mental health examiner and/or other ongoing recovery groups.

25 **16. Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent
26 shall completely abstain from the possession, injection or consumption by any route of all
27 psychotropic (mood altering) drugs, including alcohol, except when the same are ordered by a
28 health care professional legally authorized to do so as part of documented medical treatment.

1 Respondent shall have sent to the Board, in writing and within fourteen (14) days, by the
2 prescribing health professional, a report identifying the medication, dosage, the date the
3 medication was prescribed, the Respondent's prognosis, the date the medication will no longer
4 be required, and the effect on the recovery plan, if appropriate.

5 Respondent shall identify for the Board a single physician, nurse practitioner or
6 physician assistant who shall be aware of Respondent's history of substance abuse and will
7 coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled
8 substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician
9 assistant shall report to the Board on a quarterly basis Respondent's compliance with this
10 condition. If any substances considered addictive have been prescribed, the report shall identify a
11 program for the time limited use of any such substances.

12 The Board may require the single coordinating physician, nurse practitioner, or
13 physician assistant to be a specialist in addictive medicine, or to consult with a specialist in
14 addictive medicine.

15 17. **Submit to Tests and Samples.** Respondent, at her expense, shall
16 participate in a random, biological fluid testing or a drug screening program which the Board
17 approves. The length of time and frequency will be subject to approval by the Board.
18 Respondent is responsible for keeping the Board informed of Respondent's current telephone
19 number at all times. Respondent shall also ensure that messages may be left at the telephone
20 number when she is not available and ensure that reports are submitted directly by the testing
21 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately
22 to the Board by the program and Respondent shall be considered in violation of probation.

23 In addition, Respondent, at any time during the period of probation, shall fully
24 cooperate with the Board or any of its representatives, and shall, when requested, submit to such
25 tests and samples as the Board or its representatives may require for the detection of alcohol,
26 narcotics, hypnotics, dangerous drugs, or other controlled substances.

27 If Respondent has a positive drug screen for any substance not legally authorized
28 and not reported to the coordinating physician, nurse practitioner, or physician assistant, and the

1 Board files a petition to revoke probation or an accusation, the Board may suspend Respondent
2 from practice pending the final decision on the petition to revoke probation or the accusation.
3 This period of suspension will not apply to the reduction of this probationary time period.

4 If Respondent fails to participate in a random, biological fluid testing or drug
5 screening program within the specified time frame, Respondent shall immediately cease practice
6 and shall not resume practice until notified by the Board. After taking into account documented
7 evidence of mitigation, if the Board files a petition to revoke probation or an accusation, the
8 Board may suspend Respondent from practice pending the final decision on the petition to
9 revoke probation or the accusation. This period of suspension will not apply to the reduction of
10 this probationary time period.

11 18. **Mental Health Examination.** Respondent shall, within 45 days of the
12 effective date of this Decision, have a mental health examination including psychological testing
13 as appropriate to determine her capability to perform the duties of a registered nurse. The
14 examination will be performed by a psychiatrist, psychologist or other licensed mental health
15 practitioner approved by the Board. The examining mental health practitioner will submit a
16 written report of that assessment and recommendations to the Board. All costs are the
17 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
18 result of the mental health examination will be instituted and followed by Respondent.

19 If Respondent is determined to be unable to practice safely as a registered nurse,
20 the licensed mental health care practitioner making this determination shall immediately notify
21 the Board and Respondent by telephone, and the Board shall request that the Attorney General's
22 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease
23 practice and may not resume practice until notified by the Board. During this period of
24 suspension, Respondent shall not engage in any practice for which a license issued by the Board
25 is required, until the Board has notified Respondent that a mental health determination permits
26 Respondent to resume practice. This period of suspension will not apply to the reduction of this
27 probationary time period.

28 If Respondent fails to have the above assessment submitted to the Board within

1 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
2 practice until notified by the Board. This period of suspension will not apply to the reduction of
3 this probationary time period. The Board may waive or postpone this suspension only if
4 significant, documented evidence of mitigation is provided. Such evidence must establish good
5 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
6 provided. Only one such waiver or extension may be permitted.

7 19. **Therapy or Counseling Program.** Respondent at her expense shall participate
8 in an on-going counseling program until such time as the Board releases her from this
9 requirement and only upon the recommendation of the counselor. Written progress reports from
10 the counseling will be required at various intervals.

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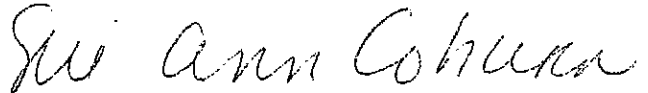
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1 ACCEPTANCE

2 I have carefully read the above Stipulated Settlement and Disciplinary Order and
3 have fully discussed it with my attorney, James E. Leininger, Esquire. I understand the
4 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated
5 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
6 bound by the Decision and Order of the Board of Registered Nursing.


7 DATED: 9.2.03



8 SUSAN ANN COBURN, AKA SUE ANN COBURN
9 Respondent

10 I have read and fully discussed with Respondent SUSAN ANN COBURN, aka
11 SUE ANN COBURN the terms and conditions and other matters contained in the above
12 Stipulated Settlement and Disciplinary Order. I approve its form and content.

13 DATED: 9/2/03


14 
15 JAMES E. LEININGER, ESQUIRE
Attorney for Respondent

16 ENDORSEMENT

17 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
18 submitted for consideration by the Board of Registered Nursing of the Department of Consumer
19 Affairs.

20
21 DATED: 9.10.03

22 BILL LOCKYER, Attorney General
of the State of California

23 
24 MARETTA D. WARD
25 Deputy Attorney General
26 Attorneys for Complainant

BILL LOCKYER, Attorney General
of the State of California
MARETTA D. WARD, State Bar No. 176470
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Attorneys for Complainant

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

SUSAN ANN COBURN,
AKA SUE ANN COBURN
P O Box 360160
Milpitas, CA 95036
Registered Nurse License No. 431649
Nurse Practitioner Certification No. 8774

Case No. 2003-191

ACCUSATION

Respondent.

Complainant alleges:

PARTIES

1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

2. On or about August 31, 1988, the Board of Registered Nursing ("Board") issued Registered Nurse License Number 431649 to Susan Ann Coburn, aka Sue Ann Coburn (hereinafter "respondent"). The license will expire on September 30, 2004, unless renewed.

3. On or about October 18, 1996, the Board issued Nurse Practitioner Certification Number 8774 to Susan Ann Coburn, aka Sue Ann Coburn (hereinafter "respondent"). The certification will expire on September 30, 2004, unless renewed.

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STATUTORY PROVISIONS

4. Section 2750 of the Business and Professions Code ("Code") provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2761(a) of the Code provides, in pertinent part:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"Unprofessional conduct . . ."

6. Section 2762 of the Code provides, in pertinent part:

"In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

"(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or administer to another, any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as defined in Section 4022.

"(b) Use any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public or to the extent that such use impairs his or her ability to conduct with safety to the public the practice authorized by his or her license.

"....."

"(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record pertaining to the substances described in subdivision (a) of this section."

7. Health and Safety Code section 11350(a) provides, in pertinent part, that except as otherwise provided in this division, every person who possesses (1) any controlled substance specified in subdivision (b) or (c), or paragraph (1) of subdivision (f) of Section 11054, specified in paragraph (14), (15), or (20) of subdivision (d) of Section 11054, or specified in subdivision (b), (c), or (g) of Section 11055, or (2) any controlled substance classified in Schedule III, IV, or V which is a narcotic drug, unless upon the written prescription of a physician, dentist, podiatrist, or veterinarian licensed to practice in this state, shall be punished by imprisonment in the state prison.

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

DRUGS

9. The term "dangerous drug" means any drug unsafe for self-medication within the meaning of Business and Professions Code section 4022 in that it requires a prescription under federal law.

10. "Ativan" is a brand of lorazepam, is a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(13), and a dangerous drug within the meaning of Business and Professions Code section 4022.

11. "Lorazepam" is a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(11).

12. "Phenobarbital" is a Schedule IV controlled substance as designated by Health and Safety Code section 11057(d)(21), and a dangerous drug within the meaning of Business and Professions Code section 4022.

13. "Tylenol with Codeine" is a compound consisting of not more than 90 mg. of codeine and 300 mg. of acetaminophen per tablet, and is a Schedule III controlled substance as designated by Health and Safety Code section 11056(e)(2), and a dangerous drug within the meaning of Business and Professions Code section 4022.

1 14. "Vicodin" is a compound consisting of 500mg. acetaminophene per tablet
2 and 5mg. hydrocodone bitartrate also known as dihydrocodeinone, a Schedule III controlled
3 substance as designated by Health and Safety Code section 11056(e)(4), and a dangerous drug
4 within the meaning of Business and Professions Code section 4022.

5 **FIRST CAUSE FOR DISCIPLINE**

6 (Obtaining, Possessing, and Self-Administering Controlled Substances)

7 15. Respondent's registered nurse license is subject to disciplinary action
8 under section 2761(a) of the Code and section 2762(a) of the Code, in that on or about
9 November 7, 2000, while employed at Santa Clara Valley Medical Center Main Jail Medical
10 Unit, San Jose, California, respondent obtained, possessed, and self-administered two Vicodin
11 tablets without a prescription therefor and without any other legal authority to do so, in violation
12 of Health and Safety Code section 11350(a).

13 **SECOND CAUSE FOR DISCIPLINE**

14 (Dangerous or Injurious Use of Controlled Substances)

15 16. Respondent's registered nurse license is subject to disciplinary action
16 under section 2761(a) and section 2762(b) of the Code in that on or about November 7, 2000, as
17 set forth under paragraph 15 above, respondent used Vicodin to such an extent or in such a
18 manner as to be dangerous or injurious to respondent, any other person, or the public, or to the
19 extent that such usage impaired respondent's ability to conduct with safety to the public the
20 practice of nursing.

21 **THIRD CAUSE FOR DISCIPLINE**

22 (False or Grossly Inconsistent Record Entries)

23 17. Respondent's registered nurse license is subject to disciplinary action
24 under section 2761(a) and section 2762(e) of the Code in that while employed at Santa Clara
25 Valley Medical Center Main Jail Medical Unit, San Jose, California, respondent committed the
26 following acts involving false, grossly incorrect, or grossly inconsistent entries in a hospital,
27 patient, or other record pertaining to controlled substances:

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1 a. On or about November 7, 2000, as set forth under paragraph 15
2 above, respondent made false entries in a Controlled Substance Count Discrepancy Report Form
3 pertaining to two Vicodin tablets.

4 b. On or about November 10, 2000, at approximately 2100 hours,
5 respondent obtained one dose of Lorazepam 1mg. for administration to a patient. Thereafter,
6 respondent failed to properly document the administration of the medication on the patient's
7 medication administration record.

8 c. On or about November 10, 2000, at approximately 2400 hours,
9 respondent obtained three Tylenol with Codeine tablets for administration to a Patient "A," two
10 Vicodin tablets for administration to Patient "B," and three doses of Phenobarbital 30mg. for
11 administration to Patient "C" without physician orders to do so. Thereafter, respondent failed to
12 document the administration of that medication on the patients' medication administration record
13 or to otherwise account for the disposition of that medication.

14 **PRAYER**

15 **WHEREFORE**, Complainant requests that a hearing be held on the matters
16 herein alleged, and that following the hearing the Board issue a decision:

17 1. Revoking or suspending Registered Nurse License Number 431649 issued
18 to Susan Ann Coburn, aka Sue Ann Coburn;

19 2. Revoking or suspending Nurse Practitioner Certification Number 8774
20 issued to Susan Ann Coburn, aka Sue Ann Coburn;

21 3. Ordering Susan Ann Coburn, aka Sue Ann Coburn to pay the reasonable
22 costs incurred by the Board in the investigation and enforcement of this case pursuant to section
23 125.3 of the Code;

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4. Taking such other and further action as deemed necessary and proper.

DATED: 2/21/03



RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant